



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

Governor Brad Little
Director John H. Tippetts

August 28, 2019

Rick Duncan, Regional Director, Operations & Pipelines Maintenance
Gas Transmission Northwest, LLC - Compressor Station 04, Samuels
700 Louisiana Street, Suite 700
Houston, TX 77002-2700

RE: Facility ID No. 017-00037, Project No. 62281, Gas Transmission Northwest, LLC -
Compressor Station 04, Samuels, Samuels
Transfer of Ownership by Permit to Construct Revision

Dear Mr. Duncan:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2019.0043, Project 62281 to Gas Transmission Northwest, LLC - Compressor Station 04, Samuels, located in Samuels for a transfer of ownership from TransCanada to TC Energy. The registered legal name remains Gas Transmission Northwest, LLC. This PTC is issued in accordance with IDAPA 58.01.01.209.04 of the Rules for the Control of Air Pollution in Idaho and is based on the certified information received on August 13, 2019. The transfer of ownership is based on the following information:

Previous Permittee Information

| | |
|-----------------------|---|
| Permittee: | PG&E Gas Transmission Northwest |
| Mailing Address: | 2100 Southwest River Parkway, Portland OR 97201 |
| Facility Location: | 237 Samuels Road, Samuels, Idaho 83864 |
| Facility Contact: | A.J. Cherian, Environmental Engineer |
| Phone Number: | (503) 833-4708 |
| E-mail Address: | not available |
| Responsible Official: | not available |
| Phone Number: | not available |

Updated Permittee Information

| | |
|--------------------|---|
| Permittee: | Gas Transmission Northwest, LLC - Compressor Station 04, Samuels |
| Mailing Address: | 700 Louisiana Street, Suite 700, Houston, TX 77002-2700 |
| Facility Location: | 237 Samuels Road, Samuels, Idaho 83864 |
| Facility Contact: | Melinda Holdsworth, US Environmental Services - Air |
| Phone Number: | (832) 320-5665 |
| E-mail Address: | Melinda_Holdsworth@tcenergy.com |

Responsible Official: Rick Duncan, Regional Director, Operations & Pipelines
Maintenance
Phone Number: (402) 492-7455

This permit is effective immediately and replaces PTC No. 017-00037, issued October 22, 1999. This permit does not release Gas Transmission Northwest, LLC - Compressor Station 04, Samuels from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

If you have any questions, please contact Shawnee Chen at (208) 373-0502 or shawnee.chen@deq.idaho.gov.

Sincerely,



Mike Simon
Stationary Source Program Manager
Air Quality Division

Attachment

MS/syc Permit No. P-2019.0043 Project 62281

Air Quality

PERMIT TO CONSTRUCT

Permittee Gas Transmission Northwest, LLC - Compressor Station 04, Samuels
Permit Number P-2019.0043
Project ID 62281
Facility ID 017-00037
Facility Location 237 Samuels Road
Samuels, Idaho 83864

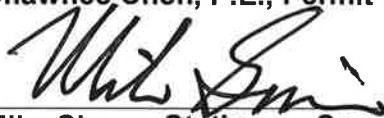
Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued August 28, 2019



Shawnee Chen, P.E., Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) for a facility name change.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. 017-00037, issued on October 22, 1999.

Regulated Sources

- 1.4 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

| Permit Section | Source | Control Equipment |
|----------------|---------------------|-------------------|
| 2 | Unit 4B Gas Turbine | low-NOx |
| | Unit 4C Gas Turbine | none |

2 Unit 4B and Unit 4C Gas Turbines

Emission Limits

2.1 NO_x Emissions - Unit 4B

Oxides of nitrogen (NO_x) emissions from the gas turbine stack shall not exceed two hundred twenty-three parts per million by volume on a dry basis (223 ppmvd) at 15% oxygen in accordance with 40 CFR 60.332. The annual NO_x emission rate shall not exceed seventy-three tons per year (73 T/yr).

2.2 NO_x Emissions - Unit 4C

Oxides of nitrogen (NO_x) emissions from the gas turbine stack shall not exceed two hundred twenty parts per million by volume on a dry basis (220 ppmvd) at 15% oxygen in accordance with 40 CFR 60.332. The annual NO_x emission rate shall not exceed three hundred fifty-two tons per year (352 T/yr)

2.3 Visible Emissions

Visible emissions from the gas turbine stacks shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period in accordance with IDAPA 16.01.01.625 (Rules for the Control of Air Pollution in Idaho). Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.4 Fuel Sulfur Content

No fuel containing sulfur in excess of 0.8 percent by weight shall be burned in the gas turbines in accordance with 40 CFR 60.333(b).

2.5 Fuel Type

The turbines shall be fired by natural gas exclusively.

2.6 Fuel Sulfur Content

No fuel containing sulfur in excess of 0.8% by weight shall be burned in the Unit 4A gas turbine.

2.7 Fuel Throughput

2.7.1 Unit 4B

The maximum amount of natural gas combusted in this compressor turbine shall not exceed one billion, one hundred ten million standard cubic feet per any consecutive 12-month period (1,110,000,000 scf/yr).

2.7.2 Unit 4C

The maximum amount of natural gas combusted in this compressor turbine shall not exceed nine hundred sixty-three million, six hundred thousand standard cubic feet per any consecutive 12-month period (963,600,000 scf/yr).

Monitoring and Recordkeeping Requirements

2.8 NO_x and SO₂ Performance Testing

Within 60 days after achieving maximum production rate, but not later than 180 days after initial start-up, the Permittee shall conduct a performance test to measure NO_x and SO₂ emissions from the Unit 4B and Unit 4C gas turbine exhaust stacks as required in 40 CFR 60.332 and .333.b, and in accordance with the test methods and procedures in 40 CFR 60.335 and in accordance with the procedures in IDAPA 58.01.01.157. During the performance test, the amount of natural gas combusted shall be recorded. This requirement is fulfilled.

2.9 Fuel Throughput - Unit 4B and Unit 4C

The Permittee shall monitor and record the amount of natural gas combusted in each turbine on a monthly and annually basis. The quantity of natural gas combusted shall be recorded as standard cubic feet and kept in a log at the facility for the most recent five-year period. The log shall be made available to DEQ representatives upon request.

2.10 Fuel Sulfur Content Monitoring

The Permittee shall monitor and record the sulfur content of the fuel being fired in the gas turbines in accordance with the approved custom fuel monitoring schedule granted to the Permittee by the Environmental Protection Agency (EPA). A copy of the semi-annual report required by EPA shall also be sent to the DEQ to demonstrate compliance with 40 CFR 60.333(b) and Permit Condition 2.4.

Reporting Requirements

2.11 Performance Test Protocol

Prior to conducting any emission test, the Permittee is strongly encouraged to submit in writing to DEQ, at least 30 days in advance, a performance test protocol in accordance with IDAPA 16.01.01.157.01.a.

2.12 Performance Test Report

In accordance with IDAPA 16.01.01.157.04, the Permittee shall submit a written report of the performance test results to DEQ within 60 days of completion of the test.

2.13 Excess NO_x and SO₂ Emissions

The Permittee shall submit to both EPA and DEQ a report of all excess emissions of NO_x and SO₂ in accordance with 40 CFR 60.7(b) through (d). Excess NO_x emissions shall be defined as in 40 CFR 60.334(c)(1), and excess SO₂ emissions shall be defined as in 40 CFR 60.334(c)(2).

2.14 Other Exceedences

The Permittee shall submit to the DEQ a report of any and all exceedences of any emission rate, visible emission or operating requirement listed in Permit Conditions 2.1 through 2.7 within a reasonable amount of time of the exceedance in accordance with IDAPA 16.01.01.130.

2.15 Certification of Documents

All documents including, but not limited to, records, monitoring data, supporting information, testing reports, or compliance certifications submitted to the DEQ shall contain a certification by a responsible official, in accordance with IDAPA 16.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

3 General Provisions

General Compliance

3.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the “Rules for the Control of Air Pollution in Idaho.” The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the “Rules for the Control of Air Pollution in Idaho,” and the Environmental Protection and Health Act (Idaho Code §39-101, et seq).

[Idaho Code §39-101, et seq.]

3.2 The permittee shall at all times (except as provided in the “Rules for the Control of Air Pollution in Idaho”) maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

3.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

3.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

3.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

3.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 3.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 3.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 3.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

Monitoring and Recordkeeping

- 3.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

- 3.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 3.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

- 3.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

- 3.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

- 3.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

- 3.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]